

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551-FDS

Hon. F. Dennis Saylor IV

**DECLARATION OF KEVIN GANNON IN SUPPORT OF
PLAINTIFF’S MOTION TO COMPEL PRODUCTION OF
SAMPLES OF THE ACCUSED PRODUCTS**

1. I am an attorney with the law firm Prince Lobel Tye LLP, attorneys for plaintiff, Singular Computing LLC (“Singular”).

2. I submit this declaration in support of Singular’s Memorandum of Law in support of its motion to compel the production of samples of the accused TPUv2 and v3 processing boards.

3. Attached as Exhibit A is a true and correct copy of page 2 of Exhibit B of Plaintiff’s Preliminary Patent Related Disclosures dated September 4, 2020.

3. Attached as Exhibit B is a true and correct copy of page 4 of the Telephonic Status Conference transcript of November 9, 2020.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on November 19, 2020 at Boston, Massachusetts.

/s/ Kevin Gannon
Kevin Gannon